

EXHIBIT 307

STACEY E. PLASKETT Confidential
GOV. OF U.S. vs JPMORGAN CHASE BANK

May 09, 2023

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1
2 UNITED STATES DISTRICT COURT FOR THE
3 SOUTHERN DISTRICT OF NEW YORK

4 -----
5 GOVERNMENT OF THE UNITED
6 STATES OF AMERICA,

7 Plaintiff,

8 v Case No. 1:22-cv-10904-UA
9 JPMORGAN CHASE BANK, N.A.,

10 Defendant,
11 -----
12
13

14 CONFIDENTIAL

15 VIDEOTAPED DEPOSITION OF

16 STACEY E. PLASKETT

17 Tuesday, May 9, 2023

18 9:00 a.m. EST

19
20
21
22
23
24 Reported by: Goldy Gold, RPR

25 Job No. J9647388

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2 Q. What are the limits? 02:18

3 A. At that time, I believed an 02:18
4 individual could give over 30,000. I can't 02:18
5 remember the exact amount, but it was in the 02:18
6 range of 30,000. 02:18

7 Q. How much did you ask Mr. Epstein to 02:18
8 give? 02:18

9 A. To the maximum, whatever that 02:18
10 maximum was. 02:19

11 Q. Okay. How do you get somebody to 02:19
12 give that much money? 02:19

13 A. You ask them. 02:19

14 Q. Okay. Did Mr. Epstein ever ask for 02:19
15 anything from you? 02:19

16 A. No. 02:19

17 MR. NEIMAN: Let me know mark now as 02:19
18 Plaskett Exhibit 40, a one-page text 02:19
19 exchange. 02:20

20 [Exhibit 40, September 2018 text 02:20
21 exchange, was marked for identification.] 02:20

22 BY MR. NEIMAN: 02:20

23 Q. All right. Ms. Plaskett, I've 02:20
24 handed you Exhibit 40, which is a text exchange 02:20
25 between you and Jerome, your chief of staff, in 02:20

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1	STACEY PLASKETT - CONFIDENTIAL	
2	Q. Lawyers for JPMorgan, correct?	03:53
3	A. Yes.	03:53
4	Q. Thank you. We can put that aside.	03:53
5	Ms. Plaskett, I am going to try to	03:53
6	be as brief as I can today, but we had a lot of	03:53
7	questions this morning about your tenure at EDA	03:53
8	and I want to make sure that a few things are	03:53
9	clear on the record.	
10	When did you leave ADA?	03:53
11	A. In April of 2012.	03:53
12	Q. After April of 2012, did you have	03:53
13	any role in the Virgin Islands government?	03:54
14	A. No.	03:54
15	Q. Currently, you are a Congresswoman	03:54
16	representing the Virgin Islands, correct?	03:54
17	A. Yes.	03:54
18	Q. And that's part of the federal	03:54
19	government, right?	03:54
20	A. Yes.	03:54
21	Q. And do you understand that there's a	03:54
22	difference between the Virgin Islands government	03:54
23	and the federal government?	03:54
24	A. Very much so.	03:54
25	Q. Thank you. After 2012, did you have	03:54

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1	STACEY PLASKETT - CONFIDENTIAL	
2	any authority over decisions regarding EDA tax	03:54
3	benefits?	
4	A. No, I did not have authority over	03:54
5	tax benefits at any time.	03:54
6	Q. Thank you. After April of 2012, did	03:54
7	you have any input over decisions regarding EDA	03:54
8	tax benefits?	03:54
9	A. No, I did not after 2012.	03:54
10	Q. After April of 2012, did you have	03:54
11	any responsibility for anything having to do with	03:54
12	the granting or renewal or applications or	03:55
13	monitoring or compliance regarding EDA tax	03:55
14	benefits?	03:55
15	A. No, I did not.	03:55
16	Q. When did you join EDA?	03:55
17	A. In December 2007.	03:55
18	Q. When you joined EDA, was Financial	03:55
19	Trust Company already receiving tax benefits from	03:55
20	the Virgin Islands?	03:55
21	A. Yes.	03:55
22	Q. Before you joined EDA, did you have	03:55
23	anything to do with the decisions to initially	03:55
24	grant Mr. Epstein's company tax benefits from the	03:55
25	Virgin Islands?	03:55